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*Attorneys for Frontline Hospital, LLC d/b/a
North Star Hospital and Juliette Rosado*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

DION K. HUMPHREY,

Plaintiff,

vs.

RENEE STRAUBE, JULIETTE ROSADO,
STATE OF ALASKA OFFICE OF
CHILDREN SERVICES, NORTHSTAR
BEHAVIORAL HEALTH,

Defendants.

Case No. 3:22-cv-00009-JMK

**OPPOSITION TO MOTION TO ADMIT EXHIBIT A5C TO MOTION IN
OPPOSITION TO NORTHSTAR (SIC) HOSPITAL AND JULIETTE ROSADO'S
REPLY TO MOTION TO DISMISS**

Defendants Frontline Hospital, LLC d/b/a North Star Hospital ("North Star") and Juliette Rosado (together "North Star defendants") oppose the plaintiff's motion to add an additional exhibit, "A5C", to the briefing related to the North Star defendants' Motion to

Dismiss. The filings related to the North Star Defendants' Motion to Dismiss are complete.¹

The plaintiff in his motion does not show the good cause required to supplement the record of the Motion to Dismiss. He does not explain how this exhibit was unavailable at the time he filed his opposition on December 2, 2022.² He does not explain how the exhibit – purportedly an incident log involving his son– is admissible evidence, or how it is relevant to the motion to dismiss, or lay any foundation for it to be admissible evidence.

Because the plaintiff does not provide even the minimal foundation necessary to admit an untimely exhibit, the Court should deny the plaintiff's motion and grant the North Star Defendants' ripe Motion to Dismiss.

CASHION GILMORE & LINDEMUTH
Attorneys for Frontline Hospital, LLC d/b/a
North Star Hospital and Juliette Rosado

DATED: January 18, 2023

s/ Chester D. Gilmore
Chester D. Gilmore
Alaska Bar No. 0405015

¹ See North Star Hospital and Juliette Rosado's Reply to Opposition to Motion to Dismiss filed on December 21, 2022, at Docket 30.

² Docket 26.

CERTIFICATE OF SERVICE:

I hereby certify that a true and correct copy
of the foregoing was served via email on
January 18, 2023 on the following:

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CASHION GILMORE & LINDEMUTH

By: s/ Chester D. Gilmore